

STATE OF SOUTH CAROLINA

(Caption of Case)

In the Matter of:

Petition of the Office of Regulatory Staff to
Establish Dockets to Consider Implementing
the Requirements of 1251 (Net Metering and
Additional Standards of the Energy Policy Act
of 2005

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2005 - 385 - E

(Please type or print)

Submitted by: Catherine E. HeigelSC Bar Number: 9268Address: 526 S. Church Street, EC03TTelephone: 704-382-8123Charlotte, NC 28202Fax: 704-382-5690

Other: _____

Email: ceheigel@duke-energy.com

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DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input checked="" type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-385-E

In the Matter of:)	
Petition of the Office of Regulatory Staff to)	RESPONSIVE TESTIMONY OF
Establish Dockets to Consider Implementing)	BARBARA G. YARBROUGH FOR
the Requirements of 1251 (Net Metering and)	DUKE ENERGY CAROLINAS
Additional Standards of the Energy Policy Act)	
of 2005)	

1 Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH DUKE
2 ENERGY CORPORATION.

3 A. My name is Barbara G. Yarbrough. My business address is 526 South Church
4 Street, Charlotte, North Carolina. I am Rates Director for Duke Energy Carolinas,
5 LLC (referred to hereinafter as “Duke Energy Carolinas” or the “Company”). I
6 have responsibility for assisting in the development, implementation and proper
7 administration of the Company’s rate schedules and service regulations, as well as
8 administering the Commission’s Rules and Regulations. I am also responsible for
9 responding to customer inquiries including those directed to the South Carolina
10 Office of Regulatory Staff.

11 Q. HAVE YOU PREVIOUSLY FILED DIRECT TESTIMONY IN THIS
12 DOCKET?

13 A. Yes, I have.

14 Q. WHAT IS THE PURPOSE OF YOUR RESPONSIVE TESTIMONY?

15 A. The purpose of my responsive testimony is to address the concerns expressed by
16 several intervenors regarding the facilities fees, demand charges, and designation
17 of peak and off-peak hours contained in Duke Energy Carolinas’ net metering
18 tariff (“Rider NM”) and flat rate tariff (“Rider SCG”) proposed in this docket in
19 response to Commission Order 2007-618, dated August 30, 2007 (the
20 “Commission’s Order”). Further, I will explain how the Company designed its
21 flat rate tariff – Rider SCG – and how the charges under this option compare to
22 the charges under Rider NM.

1 **Q. PLEASE RESPOND TO WITNESS GREENLAW’S TESTIMONY**
2 **REGARDING “REDUNDANT, ARBITRARY AND/OR PUNITIVE FEES.”**

3 A. A fundamental principle of utility rate-making is that the rates charged to its
4 customers be based on cost of service. The fees and charges contained in Rider
5 NM and Rider SCG are based on the Company’s cost of service. Thus, the
6 charges for Duke Energy Carolinas’ net metering customers are neither redundant
7 nor arbitrary or punitive. Ms. Greenlaw provides no basis for this statement,
8 which is simply incorrect.

9 **Q. PLEASE EXPLAIN WHY THE TIME-OF-USE RATE IS APPROPRIATE**
10 **FOR NET METERING CUSTOMERS.**

11 A. Duke Energy Carolinas’ net metering tariff, Rider NM, was designed with several
12 objectives in mind. First, it allowed the Company to utilize an existing cost-based
13 tariff to allow the customer to offset load from his generator. Ms. Greenlaw
14 suggests that customers be paid the “full retail rate” and Duke Energy Carolinas’
15 net metering option under Rider NM does just that. Each kilowatt of capacity
16 provided during the monthly peak period and each kilowatt hour generated by the
17 customer are credited as the same rate the customer is charged. Secondly, the
18 time-of-use tariff is the one that most appropriately reflects the costs of serving a
19 net metering customer, especially a photovoltaic system, which provides the most
20 value during peak hours. Customer-owned generator systems are not a consistent,
21 reliable source of capacity; the benefit from such systems is generally the energy
22 provided. A time-of-use rate appropriately values capacity and energy separately.
23 Thirdly, because a time-of-use rate already requires a time of use meter, no

1 additional metering charges were included in the rate for the net metering
2 customer under Rider NM.

3 **Q. WITNESSES ODELL, GREENLAW AND SMITH ARGUE THAT THE**
4 **COMPANY'S TARIFFS SHOULD NOT INCLUDE DEMAND CHARGES.**
5 **PLEASE EXPLAIN WHY DEMAND CHARGES ARE APPROPRIATE.**

6 A. Electric rates in their purest form would have three types of charges: (1) a
7 customer charge that would recover all of the basic costs of providing service,
8 (e.g. meter, meter reading, billing, payment, etc.); (2) a demand charge reflecting
9 the fixed cost of generation, transmission and distribution capacity required to
10 serve the customer; and (3) an energy charge based on the variable amount of
11 energy used by the customer. Demand charges are not only appropriate, but are
12 the most accurate way of collecting for the fixed cost of capacity required by the
13 customer on an annual basis. Because small customer generators are offsetting
14 their requirements from the utility, use of the demand charge (i) more accurately
15 reduces the customer's bill when the generator truly offsets the need for capacity,
16 and (ii) more accurately charges the customer for the appropriate capacity costs
17 when the generator is not operating. The time-of-use rate provides an even greater
18 degree of accuracy because charges (or credits) also vary according to the time of
19 day and season that energy is produced and/or used. For customers using
20 generators, time-of-use rates with a demand charge do a much better job of
21 avoiding improper cross subsidies. Time-of-use rates do not charge more than
22 standard rates; rather, they are designed to be revenue-neutral. Time-of-use rates
23 with demand charges should be more attractive to residential customers than

1 time-of-use rates without demand charges. A reduction of 1 kilowatt during the
2 summer peak hours of the month produces a savings of \$6.41, plus energy savings
3 when the usage for that period can be eliminated or shifted to lower price hours.
4 Under a non time-of-use rate, the customer would have to completely eliminate
5 approximately 80 kilowatt hours per month (roughly two (2) full days of energy
6 usage), to achieve the same savings as reducing 1 kW during the on-peak period
7 under a time-of-use rate. Kilowatt demand can often be reduced much more easily
8 than reduction in energy, especially in light of the fact that the summer on-peak
9 hours represent less than 20% of the total hours during a month.

10 **Q. PLEASE RESPOND TO WITNESS GREENLAW'S CRITICISMS OF THE**
11 **DIFFERENCES IN THE COMPANY'S PEAK HOURS IN ITS TIME-OF-**
12 **USE TARIFFS AND THE TARIFF USED FOR PAYMENT OF EXCESS**
13 **ENERGY UNDER THE FLAT RATE OPTION.**

14 A. The peak hours on the time of use rate are aligned with the hours during the week,
15 Monday through Friday, when demand for electricity is the highest; therefore, the
16 benefits of reduction in energy usage from a customer-owned generator are
17 credited accordingly. Duke Energy Carolinas filed a "flat rate" option – Rider
18 SCG -- which like Rider NM, uses existing Commission-approved rate schedules.
19 Under Rider SCG, the standard kilowatt hour rate applies for the net energy
20 purchased from the Company by the customer, meaning the customer is credited
21 at the full retail rate, even if there is no reduction in capacity required by the
22 utility to serve the customer. In the Commission's Order, which required the
23 utilities to file a flat rate option, the Commission ordered:

1 Specifically, the tariff should be designed to allow residential and
2 small commercial customers to pay the utility's existing flat kWh
3 rate for any power purchased from the utility, while receiving a
4 credit for any excess generation provided to the utility on a
5 peak/off peak or real time basis. This tariff should be designed to
6 eliminate, as much as possible, any cross-subsidization of
7 customers. Order No. 2007-618, at 3.
8

9 To comply with this order, the Company relied on Schedule PP, a Commission-
10 approved tariff, to compensate the customer for excess energy based on the
11 Company's avoided cost in exactly the same way a large customer would be
12 compensated for excess energy under the Company's approved parallel
13 generation Schedule PG, which also pays for excess energy using the rates in
14 Schedule PP. The on-peak hours under Schedule PP are longer than those under
15 the time-of-use rate, but this actually benefits the photovoltaic customer because
16 the customer is paid higher on-peak rates over more hours of the day.

17 **Q. CAN YOU EXPLAIN WHY THE BASIC FACILITIES CHARGES UNDER**
18 **RIDER NM AND RIDER SCG ARE DIFFERENT?**

19 A. Because the \$11.59 Basic Facilities Charge under a time-of-use rate already
20 reflects the cost of a time-of-use meter, no additional meter cost was included
21 with Rider NM. There are, however, additional administrative costs required to
22 manage net metering accounts which must measure excess energy. To help offset
23 some of the additional administrative costs for net metering customers and
24 minimize the subsidy, Rider NM provides that excess kilowatt hours not used by
25 the customer during the year are returned to the Company annually.

26 **Q. HOW DID DUKE ENERGY CAROLINAS DESIGN ITS FLAT RATE**
27 **TARIFF?**

1 A. Duke Energy Carolinas designed its flat rate tariff option to be consistent with (i)
2 the directives in the Commission’s Order, and (ii) the approach taken by the
3 Company in the design of Rider NM. Duke Energy Carolinas’ proposal uses
4 existing standard rates approved by the Commission in conjunction with a new
5 Rider SCG. The standard residential rates have a small Basic Facilities Charge of
6 \$6.16, which has not been adjusted in over 20 years. Because this Basic Facilities
7 Charge does not include the cost of a meter, and because the Commission’s Order
8 required that the flat rate option pay customers for excess “on a peak/off peak or
9 real time basis,” the Company included a Supplemental Basic Facilities Charge to
10 cover the incremental metering costs for a time-of use meter that can also measure
11 the flow of energy in both directions. In addition, because Rider SCG allows the
12 small customer generator to offset usage, kilowatt hour for kilowatt hour, at the
13 full retail rate of approximately 8 cents/kWh, the Company’s recovery of fixed
14 costs is eroded. As a result, the Company included a small Standby Charge to be
15 compliant with the Commission’s Order that the flat rate option “eliminate, as
16 much as possible, any cross-subsidization of customers.”

17 Although it would be appropriate to do so, the flat rate option proposed by
18 Duke Energy Carolinas does not charge customers for the significantly higher
19 administrative costs caused by these installations. The higher administrative costs
20 were also not included in Rider NM. One example of increased administrative
21 costs under the flat rate option is the costs the Company incurs because of its
22 inability to use more cost-effective “drive-by” meter reading capability for these
23 customers.

1 **Q. HOW DO THE CHARGES UNDER RIDER NM AND RIDER SCG**
2 **COMPARE?**

3 A. A close examination shows that the basic costs are comparable under either of the
4 rate options. Under the Rider SCG option, the Basic Facilities Charge and
5 Standby Cost for a typical 2 kW generator is \$11.81 compared to \$11.59 under
6 the Rider NM option. Ms. Greenlaw states that “the utilities charge more for
7 basic facilities charges although the costs of the use of facilities by customer
8 generators have not been studied.” Greenlaw Testimony, at 2, lines 50-51.
9 Although it is true that Duke Energy Carolinas has not studied the actual costs of
10 serving customers with generator systems, we are confident that the incremental
11 billing and administration of these accounts alone would justify a higher Basic
12 Facilities Charge than has been proposed in this proceeding.

13 **Q. PLEASE RESPOND TO MS. GREENLAW’S STATEMENT THAT THE**
14 **CUSTOMER GENERATOR NEEDS TO BE FULLY CREDITED.**

15 A. As I have previously indicated, both the designs of Rider NM and Rider SCG
16 more than fully credit small customer generators for the value of the energy
17 delivered to the system. Yarbrough Responsive Exhibit No. 1 shows that under
18 Rider NM or Rider SCG, the customer receives the full retail rate for energy, or
19 energy and capacity, provided by the customer generator, even though Duke
20 Energy Carolinas does not avoid any investment in generation, transmission or
21 distribution capability. Under Rider SCG, excess energy is paid to the customer
22 at the Schedule PP avoided cost on-peak and off-peak rates, comparable to the on-
23 peak and off-peak values for excess energy provided using the time-of-use rate

1 with Rider NM -- both in the range of approximately 4-5 cents per kilowatt hour.
2 Both rate options, while causing some cross-subsidization, are appropriate and
3 Duke Energy Carolinas would be very concerned about imposing even more of
4 the incremental costs on non-participating customer, especially those low-income
5 customers who do not have the resources to purchase costly photovoltaic systems.
6 Duke Energy Carolinas believes that its net metering rate offers provide benefits
7 and savings to net metering customers. Further, while these rate schedules do not
8 fully eliminate cross-subsidization, they are designed to minimize it in accordance
9 with the Commission's Order.

10 **Q. THE INTERVENORS EXPRESS CONCERN ABOUT CUSTOMERS'**
11 **ABILITY TO ACHIEVE SAVINGS FOR THE BENEFITS THEY**
12 **PROVIDE FROM CUSTOMER-OWNED GENERATION. WHAT**
13 **SAVINGS CAN A CUSTOMER ACHIEVE UNDER DUKE ENERGY**
14 **CAROLINAS' RIDER NM OR RIDER SCG?**

15 A. Duke Energy Carolinas agrees with Mr. Odell's testimony that savings achieved
16 by customer-generators, particularly solar or wind generator systems, are difficult
17 to predict because the output is dependent on the forces of nature and the
18 operation of the system. However, savings are available, and in comparable
19 amounts, under either rate option.

20 **Q. HAVE YOU PREPARED AN EXHIBIT TO ILLUSTRATE THE**
21 **POTENTIAL FOR SAVINGS?**

22 A. Yes. I used actual billing data from a North Carolina customer to create the
23 billing example for Rider SCG, and using the same data, with reasonable

1 assumptions about on-peak and off-peak usage, created a billing example for
2 Rider NM. Yarbrough Responsive Exhibit No. 2 shows a customer whose
3 monthly electrical usage requirement was 1071 kilowatt hours, and the customer's
4 2 kW photovoltaic system generated 263 kilowatt hours. The customer's bill,
5 including the supplemental Basic Facilities Charge and Standby Charge was
6 \$70.63, a savings of \$14.53, 17% less than he would have paid for the entire 1071
7 kilowatt hours used. In this example, no excess energy was assumed, but excess
8 energy would increase the savings. This exhibit also shows a bill calculation
9 using 1071 kWh under Rider NM, assuming 20% of the kilowatt hours were used
10 on-peak and 80% off-peak. The example also assumed that the customer's on-
11 peak demand would have been 7 kW without a PV system, but was reduced by
12 1.3 kW due to the operation of the PV system. Because of the summer/winter
13 differential in the rates, a weighed average monthly cost is estimated to be \$70.94,
14 which represents less than a \$1.00 difference for the same customer under the flat
15 rate option with Rider SCG. The Rider NM customer would have saved an
16 average of \$17.64 per month, approximately 20% less than Schedule RT, the
17 standard residential rate schedule. Please note that in both of these examples the
18 customers are getting the full retail rate for the output of the generator. If there is
19 excess, under either option, the customer receives the benefit of the excess at
20 approximately 4-5 cents/kWh, which is appropriate based on the Company's
21 avoided cost. Obviously customers with larger systems can produce more energy
22 and achieve greater savings. Although a typical small residential system is 2 kW,

1 we have several residential customers in North Carolina with systems ranging
2 from 4 to 10 kW.

3 **Q. DOES THIS CONCLUDE YOUR PRE-FILED RESPONSIVE**
4 **TESTIMONY?**

5 **A. Yes.**

Line

YARBROUGH RESPONSIVE EXHIBIT 1

DUKE ENERGY CAROLINAS

RIDER SCG AND RIDER NM RATE OPTIONS FOR CUSTOMERS WITH SMALL GENERATORS WHO MEET THE INTERCONNECT STANDARD

SCHEDULE RS (SC), Category 2, with Small Customer Generator Rider SCG

RATE	CHARGES	All Months
RS2	Basic Facilities Charge	\$6.16
SCG	Supplemental BFC	\$3.75
SCG	Standby Charge	\$.95 per kW of generator
		All Months
RS2	First 1000 kWh per month	7.2715 cents/kWh
	Over 1000 kWh per month	8.7605 cents/kWh
RATE	CREDITS	
	When customer load exceeds generator load	All Months
RS2	First 1000 kWh per month	(7.2715 cents/kWh)
	Over 1000 kWh per month	(8.7605 cents/kWh)
	When generator load exceeds customer load	All Months
PP	On-Peak Energy Credit	(5.44 cents/kWh)
PP	Off-Peak Energy Credit	(3.90 cents/kWh)

Note 1: Credits for excess energy, if any will further reduce energy charges

Note 2: Rider SCG can be used in conjunction with RS, RE, ES, or RT. The majority of Duke Energy residential customers are served on RS, category 2 which is used in this example.

SCHEDULE RT(SC) With Net Metering Rider NM

RATE	CHARGES	All Months
RT	Basic Facilities Charge	\$11.59 per month
		June-Sept Oct-May
RT	On-Peak Demand Charge	\$6.41 per kW \$3.21 per kW
		All Months
RT	On-Peak Energy Charge	5.1767 cents/kWh
	Off-Peak Energy Charge	4.1969 cents/kWh
RATE	CREDITS	
		June-Sept Oct-May
RT	On-Peak Demand Credit	(\$6.41 per kW) (\$3.21 per kW)
		All Months
RT	On-Peak Energy Credit	(5.1767 cents/kWh)
RT	Off-Peak Energy Credit	(4.1969 cents/kWh)

Note 1: If the net energy component is a credit, the credit may be carried forward and applied to following month. Accumulated energy credits, if any, are donated to the Company June 1 each year.

DUKE ENERGY CAROLINAS
SAMPLE BILLS UNDER RIDER SCG AND RIDER NM RATE OPTIONS

Customer energy requirements are 1071 kwh, peak demand 7 kW, reduced to 5.7 kW with 2 kW PV system, 20% of kWh are used on-peak, and PV system generates 263 kwh

SCHEDULE RS (SC), Category 2, with Small Customer Generator Rider SCG				SCHEDULE RT(SC) With Net Metering Rider NM			
					June-Sept	Oct - May	
RT	Basic Facilities Charge	\$	6.16	RT	Basic Facilities Charge	\$	11.59 \$ 11.59
SCG	Supplemental Basic Facilities Charge	\$	3.75				
SCG	Standby Charge (2 kW system)	\$	1.90				
	Total Basic Facilities and Standby Charge		\$ 11.81	RT	On-Peak Demand Charge (assume 7 kW without PV)	\$ 44.870	\$ 22.47
	Energy Charges for 1071 kWh						
RS2	First 1000 kWh	1000	\$ 72.71500	RT	On-Peak Demand Credit (assume 5.7 kW with PV -- 1.3 KW reduction)	\$ (8.33300)	\$ (4.1730)
	Over 1000 kWh	71	\$ 6.21996				
	Energy Credits for 263 kWh from PV system.			RT	Energy Charges for 1071 kWh (20% on-peak, 80% off-peak)		
RS2	192 kWh at first 1000 kWh rate	192	\$ (13.96128)		On-peak energy	214 \$ 11.07814	\$ 11.0781
	71 kWh at over 1000 kWh rate	71	\$ (6.2200)		Off-peak energy	857 \$ 35.96743	\$ 35.9674
				RT	Energy Credits for 263 kWh from PV system		
					On-peak energy credit	106 \$ (5.48730)	\$ (5.48730)
					Off-peak energy credit	157 \$ (6.58913)	\$ (6.58913)
	SCHEDULE RS2 WITH SCG				SCHEDULE RT WITH RIDER NM	\$ 83.10	\$ 64.86
	MONTHLY BILL		\$ 70.56		WEIGHTED AVERAGE MONTHLY BILL (SUMMER/WINTER)		\$ 70.94
COMPARISON				COMPARISON			
					June-Sept	Oct - May	
	SCHEDULE RS2				SCHEDULE RT	\$ 103.51	\$ 81.11
	NORMAL MONTHLY BILL RS2	\$	85.09		AVERAGE MONTHLY BILL RT		\$ 88.57
	MONTHLY BILL WITH RS2 WITH SCG	\$	70.56		AVERAGE MONTHLY BILL RT WITH NM		\$ 70.94
	MONTHLY SAVINGS	\$	14.53		AVERAGE MONTHLY SAVINGS		\$ 17.63
	% SAVINGS		17%		% SAVINGS		20%

CERTIFICATE OF SERVICE

I, Catherine E. Heigel, hereby certify that I have placed copies of the Responsive Testimony of Barbara G. Yarbrough for Duke Energy Carolinas, LLC in the U.S. mail on this date to the parties of record at the addresses shown below, with sufficient postage attached:

Nanette Edwards, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201

Shannon Bowyer Hudson, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201

Len S. Anthony
Progress Energy Service Co., LLC
Post Office Box 1551
Raleigh, NC 27602-1551

K. Chad Burgess
South Carolina Electric & Gas Co.
1426 Main Street, MC 130
Columbia, SC 29201

John F. Hardaway
1338 Pickens Street
Columbia, SC 29201

Mel Jenkins
3324 Montgomery Avenue
Columbia, SC 29205

Ruth Thomas
1339 Sinkler Road
Columbia, SC 29206

David Odell
154 Greybridge Road
Pelzer, SC 29669


Pamela Greenlaw
1001 Wotan Road
Columbia, SC 29229

Elizabeth M. Smith
611 North Shore Drive
Charleston, SC 29412

Catherine D. Taylor
South Carolina Electric & Gas Co.
1426 Main Street, M/C 130
Columbia, SC 29201

Richard L. Whitt, Esquire
Austin Lewis & Rogers, PA
Post Office Box 11716
Columbia, SC 29211

This the 11th day of April, 2008.


Catherine E. Heigel
Assistant General Counsel
Duke Energy Carolinas, LLC